REMARKS

Upon entry of this Amendment, claims 1, 33, 34, 36-41, and 43-61 remain in the Application. The Office Action of September 8, 2004 has been received and carefully considered. In response thereto, this Amendment is submitted. It is submitted that, by this Amendment, all bases of rejection and objection are traversed and overcome. Reconsideration is, therefore, respectfully requested.

In the alternative, this amendment is being submitted under the provisions of 37 C.F.R. 1.116. It is submitted that this amendment represents a good-faith effort to place the application in a condition more suitable for allowance or a condition more suitable on appeal by addressing and removing issues and rejections for consideration on appeal and by placing claims in a condition more suitable for consideration on appeal. For these reasons, entry of this amendment pursuant to the provisions of 37 C.F.R. 1.116 is respectfully requested.

Claims 1, 33, 34, 36-41, and 43-61 currently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Iorio ('223) in view of Kitamura ('354). The Iorio reference is cited as disclosing a metal layer tube comprising a metal tube 50, a zinc layer 54 bonded to the metal tube, a surface treatment layer 56 of chromate or phosphate, a layer 58 that can be considered the first polymeric layer, and can be formed of a nylon material, and a second polymeric layer 60 where additional layers 62 can be provided if desired, and where the thickness and materials claimed including the limitations of claims 37 and 38 are disclosed in the reference. The Examiner concludes that the Iorio reference discloses all of the recited structure with the exception of including phenols, specifically carbolic acid, in the primer layer where the phenols are capable of being sprayed.

The Examiner contends that the Kitamura reference discloses the recited plastic coating composition used to coat metal plates 1 that can be formed into tube shapes comprising a zinc coating on the metal plate, a treating layer using phosphoric or chromic acids, a primer layer where the primer layer can contain phenols, including phenols having R groups that include H and OH groups where the carbolic acid is a known phenol and would merely be a choice of mechanical expedience to use carbolic acids, and where such is a

sprayable material and would create the layer having a thickness obtained by spray coating. Such primer would provide a layer that adheres well to the metal layers and the layers of polyamides to allow for better connection of the two.

The Examiner indicates that the arguments previously filed on April 28, 2004 and May 25, 2004 are not considered persuasive. The Examiner indicates that the arguments are directed toward the teachings of Kitamura. The Examiner indicates that it is believed that the phenols used in Kitamura are similar to those set forth in the Applicants' specification, and the use of carbolic acid is merely an expedient. The Examiner believes that a similar structure exists in similar phenols, and that the use of carbolic acid, a simpler phenol, is an obvious mechanical expedient, where the R group is described as having H and OH. Thus, the Examiner concludes that it is not considered persuasive that the added language has overcome the reference yet. The Examiner indicates that the teachings need to be presented that provide evidence that such is not a mechanical expedient.

The Examiner also indicates that at column 5, lines 9-58, the phenol layer is sprayed and inherently would have obtained a thickness by spraying. Without any specific thickness claimed, it is believed that Kitamura meets this new limitation also. The Examiner indicates that he considers that Kitamura teaches a spray coating method that is all that is required, and any thickness achieved by the spray coating would appear to meet the current limitation.

At the outset, it should be noted that the Iorio reference is directed to a construction in which the polymeric layer is directly bonded to the surface treatment layer. The Iorio reference lacks any teaching or suggestion that the construction includes a layer interposed between the surface treatment layer and the polymeric layer(s). The teaching of Iorio directs the skilled artisan toward direct applciation of a polymeric layer onto a surface treatment layer in a multilayer tube construction to prevent or deter corrosion or damage. The reference lacks any teaching or suggestion directing the artisan toward addition of another layer (and associated process step). Furthermore, the Iorio reference lacks any suggestion of materials that would be appropriate for such use.

The Kitamura reference is directed to the application of a thin angstron-thick coating of hydroxymethyl substituted phenols (commonly referred to as hydroxybenzyl alcohols due to the chemical nature of the constituents present on the molecule) in overlying relationship to a surface treatment layer in order to prepare the surface to receive a heat bondable thermoplstic resin. The hydroxybenzyl alcohol is deposited as a gas or vapor at temperatures in excess of 150°C to a treated metal substrate. Suitable thermoplastic resin is applied and subjected to heat bonding procedures to effect appropriate layer-to-layer lap sealing (column 11, lines 10-33). Without being bound to any theory, it is believed that this heat bonding procedure is necessary to achieve when the hydroxymethyl alcohol (hydroxy substituted phenol) is employed. It can be appreciated that such a post application heat bonding step could compromise the integrity of the polymeric layer applied to the tube in the above-captioned invention.

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Iorio in view of Kitamura. The Applicants' invention as set forth in claim 1 is a multilayer tube composed of a metal tube having an outer surface. A zinc layer is bonded to the outer surface of the metal tube and a surface treatment is bonded to the zinc layer. The multilayer tube as set forth in claim 1 also includes a phenolic coating capable of spray application. The phenolic coating contains phenols having at least one substituted group "R" wherein R consists of H and OH. The multilayer tube also includes a first polymeric layer bonded to the phenolic coating and a second polymeric layer bonded to the first polymeric layer.

The Iorio reference lacks any teaching to suggest a phenolic coating such as that set forth in claim 1. The Kitamura reference is directed to a thin coating layer having a thickness on the order of angstroms formed from a hydroxymethyl substituted phenol applied to the surface of the metal using a vapor deposition method. It is respectfully submitted that the Kitamura reference directs the skilled artisan away from any teaching of spray application of a phenolic hydroxyl compound such as those employed in the present invention. Specifically, the Kitamura reference states:

> For example, when the metal surface is treated with a vapor of a compound having only a phenolic hydroxyl group (the

> compound as defined in claim 1), such as cresol or phenol, the initial bonding strength of the obtained bond structure is considerably low, and only when a surface-treating agent having not only a phenolic hydroxyl group, but also a hydroxymethyl group is used, a high bonding strength and a high bonding strength retention after the lapse of time can be obtained. (Kitamura, Column 5, lines 15-23, emphasis and parenthetical comments added.)

The reference further states at column 5 that:

> In view of the initial bonding force of the thermoplastic resin layer and the maintenance of the bonding force, even after the lapse of time, it is important that the hydroxymethyl substituted phenol should be applied in the gaseous phase to the surface of the metal material maintained at a high temperature. For example, in the case where the hydroxymethyl substituted phenol is applied to the surface of a metal material by spray coating or the like, the obtained bonding force is smaller than about one half of the bonding force attained by applying the hydroxymethyl substituted phenol in the form of a vapor. (See Kitamura, column 5, lines 9-20, emphasis added.)

It is respectfully submitted that the Kitamura reference directs the skilled artisan away from the use of compounds having only a phenolic hydroxyl group such as those set forth in the Applicants' invention as defined in claim 1. Furthermore, the Kitamura reference directs the skilled artisan away from the use of spray application of any phenolic coating.

The Kitamura reference specifically teaches that bonding force is smaller when the coating composition is applied using a spray application procedure. It should be noted that the materials disclosed in Kitamura are hydroxy substituted phenols such as those commonly referred to as saligenin. As seen from Appendix A, the hydroxymethyl substituted phenol employed in Kitamura is more appropriately disclosed or described as an alcohol. When compared to the phenol material employed in the present invention, it can be seen that the materials have highly distinctive properties yielding significant differences between the two materials.

Analysis of the respective chemical compounds also supports that the differences between them mitigates against substitution. It can be appreciated tha the material proposed in Kitamura, due to its multiple substituted moieties exhibits greater stearic hindrance. The presence of these moieties serves to deactivate electron migration in the structure rendering it less acidic and potentially less reactive than the phenols as set forth in claim 1. Thus, it is submitted that the use of the hydroxybenzyl alcohol as taught in Kitamura does not direct the skilled artisan to substitution of a phenol as is employed in the present invention. Furthermore, it is submitted that the Kitamura reference lacks any teaching that would suggest that a phenolic coating such as is employed in the present invention could be employed successfully to permit adhesion of a first polymeric layer selected from the group consisting of melt-processible thermoplastic elastomers, melt-processible ionomers, melt-processible nylons, melt-processible fluoropolymers, and mixtures thereof. Indeed, given the discussion and analysis in Kitamura, the skilled artisan would be led to believe that simple phenolic compounds would be inappropriate and undesirable as a coating layer. Thus, given the fact that the two materials are such highly distinctive and different compounds, in further view of the teachings in Kitamura, it is submitted that the Kitamura reference fails to teach or suggest a multilayer tube having a zinc layer bonded to an outer surface followed by a surface treatment layer bonded to the zinc layer and the phenolic layer defined therein positioned by spray application with multiple polymeric layers bonded thereto. For these reasons, it is submitted that the Applicants' invention as set forth in claim 1 is not taught, anticipated, or rendered obvious by the Iorio reference in view of Kitamura.

Claim 34 also stands rejected under 35 U.S.C. § 103(a) as being rendered obvious by Iorio in view of Kitamura. The Applicants' invention as set forth in claim 34 is directed to a multilayer tube as previously discussed in which the first polymeric layer consists essentially of an ionomer and a nylon. It is submitted that the Iorio reference fails to teach or suggest the phenolic coating layer employed in the present invention. Furthermore, it is submitted that the Kitamura reference lacks any teaching of the phenolic compound disclosed herein and fails to teach, suggest, or appreciate that a first polymeric layer composed of an ionomer and nylon could be successfully employed in the multilayer tube of the present invention. Without being bound to any theory, it is believed that the ionomer/nylon constituents of the first polymeric

layer provide a unique interaction with the phenolic layer so as to provide bonding and adhesion between the two respective materials, thereby providing a polymeric coated metal tube of suitable wear resistance. Furthermore, it is posited that the heat bonding procedures as taught in Kitamura to accomplish bonding between the hydroxymethyl phenol layer and the thermoplastic may have detrimental effects on the nylon/ionomer material of the present invention in some instances. Without being bound to any theory, it is believed that the reheating of the nylon/ionomer once applied to the substrate surface in order to accomplish the heat bond can cause degradation of the polymer complex as well as physical anomalies in the cavity. It is submitted that this is not taught, suggested, or rendered obvious by the Iorio reference taken alone or in view of Kitamura.

Claims 36-39 and 43 currently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Iorio in view of Kitamura. Claims 36-39 and 43 depend from claim 34 to contain all of the limitations found in that claim and in independent claim 1. It is submitted that, by this dependency, the Applicants' invention as set forth in claims 36-39 and 43 is not taught, anticipated, or rendered obvious by the cited references for the reasons discussed previously in conjunction with claims 1 and 34.

Claims 33, 40, 41 and 44-49 currently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Iorio in view of Kitamura. These claims depend either directly or indirectly from claim 1 to contain all of the limitations found therein. By this dependency, it is submitted that the Applicants' invention as set forth in claims 33, 40, 41, and 44-49 is not taught, anticipated, or rendered obvious by the cited references for the reasons discussed previously in conjunction with claim 1.

Claim 50 also stands rejected under 35 U.S.C. § 103(a) as being rendered obvious by Iorio in view of Kitamura. The Applicants' invention as set forth in claim 50 is directed to a multilayer tube comprising a metal tube having an outer surface, a zinc layer bonded to the outer surface of the metal tube, a surface treatment layer bonded to the zinc layer, and a primer comprising one or more phenols in which the primer layer is present in a thickness obtained by spray coating. The multilayer tube further includes first and second polymeric layers overlying the primer layer. The surface treatment layer is selected from the group

consisting of zinc/aluminum/rare earth allow, phosphate, and mixtures thereof. The Kitamura reference is directed to the use of materials typically referred to as hydroxybenzyl alcohols overlying chromate surface treatment layers. The reference lacks any teaching or suggestion of phosphate layers or images zinc/aluminum, rare earth alloy. Furthermore, given the teaching in Kitamura, it is submitted that the skilled artisan would not be motivated to substitute plain phenols for the hydroxybenzyl alcohols employed in the Kitamura reference. Lacking any further teaching, it is submitted that the Applicants' invention as set forth in claim 50 is not taught, anticipated, or rendered obvious by the cited references.

Claim 51 also stands rejected under 35 U.S.C. § 103(a) as being rendered obvious by Iorio in view of Kitamura. Claim 51 has been amended to specify that the priming layer comprises carbolic acid having a molecular weight 50. The molecular weight of carbolic acid is derived from the formula (6·6) + (1·8)+(6·1) where carbon has a known molecular weight of 6, oxygen has a known molecular weight of 8, and hydrogen a known molecular weight of 1. The material of choice in Kitamura has a molecular weight between 124 and 320 (see Kitamura column 4, lines 52-59). Given the extreme differences in molecular weights, as well as differences in the characteristics of the given compounds and the differences in classification of the compounds, it is submitted that Applicants' invention as set forth in claim 51 is not taught, anticipated, or rendered obvious by the cited references.

Claims 52-61 currently stand rejected under 35 U.S.C. § 103(a) as being rendered obvious by Iorio in view of Kitamura. Claims 52-61 depend from claim 51 and, ultimately, from independent claim 50, to contain all the limitations found therein. By this dependency, it is submitted that the Applicants' invention as set forth in claims 52-61 is not taught, anticipated, or rendered obvious by the cited references for the reasons discussed previously in conjunction with claim 51 and independent claim 50.

Claims 1, 34, 40, 41 and 44-50 currently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio. The Examiner indicates that the Kitamura reference discloses all of the recited structure with the exception of providing a plurality of polymeric layers to the treated metal plate formed into a pipe shape. The Examiner cites the Iorio reference as disclosing all of the structures set forth in Kitamura and states that it would

have been obvious to one skilled in the art to modify the pipe in Kitamura by providing a plurality of polymeric layers to the outside of the treated metal pipe such as would provide further protection against corrosion as suggested by Iorio.

As indicated previously, the Kitamura reference fails to teach or suggest the phenolic materials set forth in claim 1. Instead, the Kitamura reference teaches a phenol alcohol commonly referred to as hydroxybenzyl alcohol. As indicated in previous discussions, it is submitted that the Kitamura reference fails to provide the skilled artisan with sufficient motivation and teaching to employ phenolic coatings in overlying relationship to a zinc bonded layer and a surface treatment layer on a multilayer tube outer surface interposed between first and second polymeric layers. The Iorio reference lacks any teaching of any such phenolic coating material. Detailed analysis of the respective references has been presented above and is reiterated here as applicable. Thus, without more, it is submitted that the Kitamura and Iorio references fail to teach or suggest the Applicants' invention as set forth in claim 1.

Claim 34 also stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio. The Applicants' invention as set forth in claim 34 is directed to the construction previously enumerated. The first polymeric layer is defined as consisting essentially of an ionomer and a nylon. The present invention is predicated upon the unexpected discovery that the use of a phenolic coating composition as set forth in claim 1 in combination with a polymeric layer consisting essentially of an ionomer and a nylon imparted with bond strength and corrosion resistance to the metal tube in question. It is submitted that the Iorio reference fails to teach or suggest the interposition of a phenolic coating composition layer. The Kitamura reference fails to teach, suggest, or appreciate the use of a phenolic compound as defined in claim 1 and ultimately claim 34. Furthermore, the reference fails to teach or appreciate that a polymeric layer that consists essentially of an ionomer and a nylon could be efficaciously bonded in this fashion. Thus, it is submitted that the Applicants' invention as set forth in claim 34 is not taught, anticipated, or rendered obvious by the cited references.

Additionally, claims 34, 40, 41, and 44-49 currently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio. Claims 34, 40, 41, and 44-49

depend either directly or indirectly from claim 1 to contain all of the limitations found therein. By this dependency, it is submitted that the Applicants' invention as set forth in claims 34, 40, 41, and 44-49 is not taught, anticipated, or rendered obvious by the cited references for the reasons discussed previously in conjunction with claims 1 and 34.

Claim 50 currently stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio. The Applicants' invention as set forth in claim 50 is directed to a metal tube having an outer surface having a zinc layer bonded to the outer surface. A surface layer treatment is bonded to the zinc layer and is composed of zinc/aluminum/rare earth alloy, phosphate, and mixtures thereof. A priming layer is present and has a thickness obtained by spray coating. The multilayer tube also includes a first polymeric layer bonded to the priming layer and a second polymeric layer bonded to the first polymeric layer. It is respectfully submitted that the Kitamura reference fails to teach or suggest the Applicants' invention as set forth in claim 50 for the various reasons stated previously. Additionally, it is submitted that the Kitamura reference is directed to the interposition of a hydroxybenzyl alcohol over a surface treatment layer composed of a chromate or chromate like material. The Applicants' invention as set forth in claim 50 is directed to a multilayer tube in which the surface treatment layer bonded to a zinc layer consists of either zinc/aluminum/rare earth alloy or phosphate. For these reasons, it is submitted that the Applicants' invention as set forth in claim 50 is not taught, anticipated, or rendered obvious by the cited references.

Claims 33, 36-39, 43, and 51-61 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio as applied to claims 1, 34, 40, 41, and 44-45 above in further view of Kobayashi. The Examiner contends that the Kitamura reference as modified discloses all the recited structure with the exception of setting forth a specific type of phenol used in the priming layer. The Kobayashi reference is characterized as disclosing the recited coated metal plate formed into a pipe shape comprising a metal plate treated with zinc, that can be chromic acid treated, and further provided with a phenol layer. The Examiner contends that the phenol layer can be formed from specific phenols such as carbolic acid to further enhance the adhesion of polyamide connecting layers to form the pipe shape. The Examiner contends that it would have been obvious to one skilled in the art to modify the

phenols in Kitamura as modified to be carbolic acid as such are old and well-known phenols used to enhance adhesion of a polyamide layer to the treated plate to form a pipe shape as suggested by Kobayashi.

The Kobayashi reference is directed to the use of phenol-aldehyde resin compositions. In such compositions, it is critical that the composition include a phenol component reacted with an aldehyde componentto form a curable resin. It can be readily appreciated that the bicomponent material disclosed in Kobayashi is a heat curable material (see Example 7). Similarly, the epoxy-phenolic resins discussed in Kobayashi at column 1 are two-component systems in which the two components react to form a curable resin. Thus, such materials differ significantly from the phenol material of the present invention.

Claim 33 currently stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio in further view of Kobayashi. The Applicants' invention as set forth in claim 33 specifies that the phenol coating contains phenols having at least one substituted R in which R consists of H and OH. It is respectfully submitted that none of the cited references teach such phenols. The Kitamura reference is directed to materials such as hydroxybenzyl alcohols. The Kobayashi reference is directed to cured phenol-aldehyde resins and indirectly discusses phenol-epoxy resins. Thus it is ssubmitted that the cited references fail to teach or suggest the invention as set forth in claim 1. It is respectfully submitted that these materials are significantly different from the material defined in claim 33 that is specifically directed to a carbolic acid. It is submitted that claims 30, 36-39 and 40 depend from independent claim 1 to contain all of the limitations found therein. Similarly, claims 51-61 depend from claim 50 to contain all of the limitations found therein. By this dependency, it is submitted that the Applicants' invention as set forth in claims 33, 36-39, 43 and 51-61 is not taught, anticipated, or rendered obvious by the cited references.

Claims 1, 33, 34, 36-41, 43 and 44-61 currently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio and Kobayashi. The Examiner contends that the patent to Kitamura as modified discloses all of the recited structure with the exception of setting forth a specific type of phenol to use for the primer layer. The Examiner cites the Kobayashi reference as disclosing the recited coded metal plate formed into a pipe

shape comprising a metal plate treated with zinc. This composite can be chromic acid treated and further provided with a phenol layer that can be formed from specific phenols such as carboxylic acid to further enhance the adhesion of polyamide connecting layers to form the pipe shape. The Examiner contends that it would have been obvious to one skilled in the art to modify the phenols in Kitamura as previously modified by Iorio to be carboxylic acid as such material is an old and well known phenol used to enhance adhesion of a polyamide layer to the treated plate form of a pipe shape as suggested by Kobayashi.

As indicated previously, the Kitamura reference is directed to the use of a hydroxybenzyl alcohol as opposed to the basic phenol material employed in the present invention. The Iorio reference lacks any teaching or suggestion of the coating or primer material set forth in the present invention. The Kobayashi reference is directed to a curable resin containing phenol and aldehyde components. The phenol-aldehyde resin disclosed in Kobayashi is proposed to replace epoxy phenol resins described in Kobayashi as prior art. Nowhere do any of the references teach or suggest the use of the simple phenols taught in the present invention.

Claim 1 currently stands rejected under 35 U.S.C. § 103(a) as being rendered obvious by Kitamura in view of Iorio and in further view of Kobayashi. The Applicants' invention as set forth in claim 1 is directed to a multilayer tube comprising a metal tube having an outer surface. A zinc layer is bonded to the outer surface of the metal tube. A surface treatment layer is bonded to the zinc layer. A phenolic coating is positioned by spray application in overlying relationship to the surface treatment layer. The phenolic coating contains phenols having at least one substituted "R" group wherein in R consists of hydrogen or hydroxyl groups. The multilayer tube also includes a first polymeric bonded to the phenolic coating and a second polymeric layer bonded to the first polymeric layer. The Kitamura reference is directed to hydroxybenzyl alcohols as a coating layer. As taught in Kitamura, these materials can be referred to as hydroxymethyl substituted phenols. However, the reference lacks any teaching that would suggest the substitution of the phenols as strictly defined in the Applicants' invention as set forth in claim 1. Specifically, the phenolic coating contains phenols in which there is one R group consisting of H and OH. It is submitted that the

Kitamura reference lacks any teaching of such a coating. Similarly, the Iorio reference is silent regarding phenolic coatings. Finally, the Kobayashi reference is directed to a composition that contains either an aldehyde or an epoxy in combination with phenols. Such materials are two-component curing materials in which the resulting coating is a reaction product of the aldehyde or epoxy, together with phenolic material. Thus, it is submitted that the resulting coating differs significantly from the coating taught in the present invention that contains phenol materials in which the R group consists of H or OH. For these reasons, it is submitted that the Applicants' invention as set forth in claim 1 is not taught, anticipated, or rendered obvious.

Claims 34, 36-41, 43, and 44-49 also stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kitamura in view of Iorio and Kobayashi. Claims 33, 34, 36-41, 43, and 44-49 depend from claim 1 to contain all of the limitations found therein. By this dependency, it is submitted that the Applicants' invention as set forth in these claims is not taught, anticipated, or rendered obvious by the cited references for the reasons discussed previously in conjunction with claim 1.

Claim 50 currently stands rejected under 35 U.S.C. § 103(a) as being rendered obvious by Kitamura in view of Iorio and Kobayashi. The Applicants' invention as set forth in claim 50 is directed to a multilayer tube that includes a metal tube having an outer surface, a zinc layer bonded to the metal tube outer surface, a surface treatment layer bonded to the zinc layer. The surface treatment layer is selected from the group consisting of zinc/aluminum/ rare earth alloy, phosphate, and mixtures. It is respectfully submitted that the cited references fail to teach or suggest a system in which a priming layer comprising one or more phenols is present over a surface treatment layer selected from the group consisting of zinc/aluminum/rare earth alloy, phosphate, and mixtures thereof. Thus, it is submitted that the Applicants' invention as set forth in claim 50 is not taught, anticipated, or rendered obvious by the cited references. Additionally, it is submitted that the analysis of the various references previously presented in this amendment as applicable here is reiterated at this point.

Claims 51-61 currently stand rejected under 35 U.S.C. § 103(a) as being rendered obvious by the Kitamura reference in view of Iorio and Kobayashi. Claims 51-61 depend from

independent claim 50 to contain all of the limitations found therein. By this dependency, it is submitted that the Applicants' invention as set forth in these claims is not taught, anticipated, or rendered obvious by the cited references for the reasons discussed previously in conjunction with claim 50.

In summary, claims 1, 36, 43, 50, and 51 have been amended by this action. Arguments have been presented as to why the Applicants' invention as set forth in claims 1, 30, 34, 36-41, and 43-61 is in a condition suitable for allowance. Notice of allowance is, there, is respectfully requested.

Respectfully submitted,

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